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United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
JOSE GENARO VARGAS-RAMIREZ,  
  
Defendant.

CASE NO. 21-CR-00109-DAD-8

STIPULATION TO SCHEDULE CHANGE-OF-  
PLEA HEARING

DATE: October 8, 2024  
TIME: 9:30 a.m.  
COURT: Hon. Dale A. Drozd

Plaintiff United States of America, by and through its counsel of record, and defendant JOSE GENARO VARGAS-RAMIREZ (“defendant”), by and through defendant’s counsel of record, Dina Santos, hereby stipulate as follows:

1. On June 23, 2021, defendant was arraigned on the indictment in the above-captioned matter. At a hearing on July 2, 2021, defendant was ordered released on bond. Doc. 44, 68.
2. By previous order, this case was set for trial on November 4, 2024. The Court set a trial confirmation hearing for October 8, 2024. Doc. 208.
3. The government previously extended a written plea offer to defendant, and counsel for defendant indicated that defendant intends to accept that offer. The government will file the agreement upon its receipt of the signed copy from defense counsel.
4. By this stipulation, the parties respectfully request that the Court vacate the currently scheduled trial confirmation hearing and instead set a change-of-plea hearing for defendant

on the same date, October 8, 2024, so that defendant may enter his guilty plea pursuant to the parties' agreement.

IT IS SO STIPULATED

Dated: October 2, 2024

PHILLIP A. TALBERT  
United States Attorney

By: /s/ ANGELA L. SCOTT  
ANGELA L. SCOTT  
Assistant United States Attorney

Dated: October 2, 2024

/s/ DINA SANTOS per email  
authorization  
DINA SANTOS  
Counsel for Defendant  
JOSE GENARO VARGAS-  
RAMIREZ

**ORDER**

Pursuant to the parties' stipulation and for good cause shown, IT IS HEREBY ORDERED that the trial confirmation hearing currently set for October 8, 2024, is vacated as to defendant JOSE GENARO VARGAS-RAMIREZ ("defendant") and a change-of-plea hearing for defendant is hereby set for October 8, 2024, at 9:30 a.m.

IT IS SO ORDERED.

Dated: October 2, 2024

Dale A. Drozd  
DALE A. DROZD  
UNITED STATES DISTRICT JUDGE